

Ms. Karen Wolf, AICP, Senior Policy Analyst
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Dear Ms. Wolf:

Thank you for the opportunity to provide public comment on the draft Housing Chapter of the Countywide Planning Policies (CPPs) as proposed by the interjurisdictional staff of the Growth Management Planning Council (GMPC), which is based on the discussions of the housing task force. Futurewise is deeply concerned about four issues:

- The lack of accountability.
- The removal of the housing targets for local jurisdictions.
- The omission of setting countywide and local housing targets for middle income earners.
- The lack of specificity of requirements in assessing, monitoring, and reviewing housing needs, trends, and policy efficacy.

As a county and region, we have a tremendous opportunity grow more affordably and equitably. Vision 2040 expects another 1.5 million people to move to the Central Puget Sound in the next 30 years. The Washington State Office of Financial Management's 2012 Growth Management Act provisional population projections project that nearly a half million of those new residents will be in King County. In the same time, the majority of the region's people will no longer be people of Caucasian descent. As Sound Transit and other agencies build out high-capacity transit service to provide increased mobility, we have an obligation to make sure more people of all incomes live near the service to get to jobs, school, health care, and other services.

In order to provide for people of all incomes, our county and cities need to consciously plan for the housing needs. Good planning requires setting goals and targets; establishing strategies to meet the targets; implementing actions to carry out the strategies; monitoring progress; and reviewing and amending the plans, strategies, actions, and development regulations to make sure the goals can be met. With so many cities and the county all playing important roles, accountability is imperative to make sure local governments meet the countywide fair share of the regional housing need.

Local Housing Targets

Futurewise strongly recommends that the CPPs include local housing affordable targets for each of the income groups identified in the Multicounty Planning Policies. These targets are needed to make sure we are addressing our regional, countywide, and local housing needs.

The removal of the housing targets turns is deeply troubling. Instead of having just one decision in setting local housing targets by the GMPC, instead every single local jurisdiction will now have to set their own housing targets -- literally multiplying the number of political decisions forty-fold. When it's

already difficult to get these jurisdictions to set strategies and take actions to meet the regional housing need, it's completely impractical to think these same jurisdictions will individually set local targets that combine to meet the regional need. Working cooperatively to set the targets will help insure that we are working to meet our county and regional affordable housing needs.

Moreover, removing the local housing targets will not address the main concern of South King County Cities: the concern that, through the private housing market, they are already accommodating more than their fair share of the countywide need for low-cost housing. But removing the targets will not change the market forces. In fact, without the local housing targets providing a measure of accountability in East and North King County cities and the county, removing the targets will likely exacerbate the market pressure for more low-cost housing in South King County.

Further, as we explain below, the Multicounty Planning Policies require affordable housing targets for each local government.¹ Futurewise strongly recommends retaining the local housing targets for each jurisdiction.

However, in the absence of retaining the local housing targets for each jurisdiction, the following language addressing regional fair share of housing a second-best approach to affordable housing targets:

H-1 Address the countywide share of the regional need for housing for those with lower incomes and special needs. The countywide need for housing by percentage of Area Median Income (AMI) is:

<u>80-120% of AMI (middle-income)</u>	<u>XX% of total housing supply</u>
50-80% of AMI (moderate)	16% of total housing supply
30-50% of AMI (low)	12% of total housing supply
30% and below AMI (very-low)	12% of total housing supply

Each city shall adopt a plan, strategies, and actions that will achieve the jurisdiction's fair share for the countywide need for each AMI range. Each city shall adopt development regulations with densities and housing types that can accommodate the jurisdiction's fair share of the countywide need for each AMI range. Affordable housing shall be equitably distributed through the county's urban areas.

Regardless of this suggested second-best language, Futurewise will continue to advocate for local housing targets throughout the process as we do not believe the current proposal incorporates best practices for planning for affordable housing and is not consistent with the multicounty planning policies.

¹ See Puget Sound Regional Council, Vision 2040 Part III: Multicounty Planning Policies p. 62, pp. 64-65, p. 70 (Dec. 2009), accessed on May 10, 2012 at: http://www.psrc.org/assets/1738/Part_III_Multicounty_Planning_Policies.pdf

Accountability

Futurewise strongly recommends creating accountability for local jurisdictions to do their fair share toward the countywide housing need.

With the removal of the targets, the most concerning aspect of the proposed Housing Chapter is the lack of clear accountability. The lack of accountability impedes our ability to provide our fair shares of the regional housing needs across the income spectrum. Without a clear method to evaluate and adapt our programs and regulations to support affordable housing, it will be difficult to meet our local, county, and regional housing needs. Removing the targets will make this problem worse.

In the absence the CPPs assigning local housing targets, the local governments will need to assess their fair share of the countywide housing targets. Therefore, to assure the countywide targets are met, the GMPC will need to have a countywide review and reconciliation process of all local targets, plans, strategies, and actions. In addition, the GMPC will need to require underperforming jurisdictions to amend their targets, plans, and actions.

Futurewise recommends the following line-by-line changes to assure accountability in the absence of prescribed local housing targets:

H-15 Collaborate in developing sub-regional and countywide housing resources and programs, including funding, to provide affordable housing for very-low, low-, and moderate-income households, including evaluating the creation of a regional or countywide housing funding program and developing and implementing a regional or countywide inclusionary zoning program.

H-18 ~~Periodically, Every two years, review countywide affordability policies, strategies, actions, and development regulations and amend policies, strategies, actions, or development regulations where monitoring indicates that the results are inadequate for meeting the countywide fair share of the regional need. and amend the countywide and local housing policies and strategies, especially where monitoring indicates that adopted strategies are not resulting in adequate affordable housing to meet the countywide need.~~

H-19 Every four years, review and reconcile local housing policies, strategies, actions, and development regulations to assure the combined local efforts will achieve the regional affordability need. Where monitoring indicates that the results are inadequate for a local municipality to meet its fair share of the countywide needs, the GMPC interjurisdictional planning staff shall cooperatively work with the municipality to identify and implement corrective policies, strategies, and actions within 12 months. This program shall be consistent with the "show your work" requirements in Multicounty Planning Policies "H-Action-2" and may be combined with that process.

Middle Income Earners

Futurewise recommends adding a middle-income bracket for the housing targets. We read the Multicounty Planning Policies as requiring local housing and affordable housing targets.² Multicounty Planning Policy MPP-G-2 provides that the countywide planning policies are to be updated where necessary to address the multicounty planning policies prior to December 31, 2010.³

Futurewise recommends the following language to address the middle-income bracket:

H-1 Address the countywide share of the regional need for housing for those with lower incomes and special needs. The countywide need for housing by percentage of Area Median Income (AMI) is:

<u>80-120% of AMI (middle-income)</u>	<u>XX% of total housing supply</u>
50-80% of AMI (moderate)	16% of total housing supply
30-50% of AMI (low)	12% of total housing supply
30% and below AMI (very-low)	12% of total housing supply

In addition, additional language will need to be added throughout the Housing Chapter to list “middle-income” along with the moderate, low, and very-low income brackets.

Assessment, Strategies, & Monitoring

Futurewise strongly recommends that the CPPs specifically list additional important factors for assessing, strategizing, and monitoring the current and future housing needs. Especially important are the ability to meet the regional housing need outlined in Vision 2040 and the consideration of the location of housing and how that impacts job access⁴ and transportation affordability⁵ for moderate, low, and very-low income households. In addition, Futurewise believes that Appendix 4 to the CPPs should be more than just mere “guidance,” and that the three references to the Appendix in the CPPs should be consistent.

For Futurewise’s entire recommended changes to the assessment, strategies, and monitoring sections of the Housing Chapter, see the attached document for line-by-line edits.

² See Puget Sound Regional Council, Vision 2040 Part III: Multicounty Planning Policies p. 62, pp. 64-65, p. 70 (Dec. 2009), accessed on May 10, 2012 at:

[http://www.psrc.org/assets/1738/Part III Multicounty Planning Policies.pdf](http://www.psrc.org/assets/1738/Part_III_Multicounty_Planning_Policies.pdf).

³ Id. at p. 33.

⁴ The Brookings Institution has mapped job access by transit for the top 100 largest metropolitan regions across the country, including the Central Puget Sound. The model analyzes travel time via transit between each census block group (origin) and every census tract (destination). The map and data are available for free online at http://www.brookings.edu/metro/jobs_and_transit/Map.aspx.

⁵ The Center for Neighborhood Technology provides a locational affordability based on housing and transportation costs for every major metropolitan region across the country, including the Central Puget Sound. The model is based data from each census block group. The map and data are available for free online at <http://htaindex.cnt.org/>.

Thank you for considering Futurewise's comments. If you have any questions, contact me at brock@futurewise.org or (206) 343-0681 ext. 112.

Sincerely,

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